

BRACEWELL

October 25, 2019

VIA ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write to seek a modification of Mustafa Abdel-Wadood's bail conditions. Mr. Abdel-Wadood is currently subject to electronic monitoring by GPS and is permitted to travel in Manhattan between 7 a.m. and midnight. There are also four co-signors on a \$10 million bond secured by two properties. We respectfully request that Mr. Abdel-Wadood's travel restrictions be extended to include the Southern and Eastern Districts of New York and that his midnight curfew be removed. Permitting Mr. Abdel-Wadood to travel throughout the Southern and Eastern Districts would allow him greater freedom, especially when his family visits over the upcoming holidays. Mr. Abdel-Wadood would continue to be electronically monitored and his bond conditions, including the surrender of his passports, would otherwise remain in place.

The government (AUSA Andrew Thomas) consents to this proposed modification; Pretrial Services has no objection and reports that Mr. Abdel-Wadood has been fully compliant with his bail conditions.

Respectfully submitted,
/s/ Paul Shechtman

Paul Shechtman

cc: AUSA Andrew Thomas
Pretrial Services Officer Joshua Rothman

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